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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
JAN 9 2014
Chief Judge Ruben Castillo
United States District Court

UNITED STATES OF AMERICA, *et al.*)
ex rel. ANITA HSIEH, KARA HARRIS,)
and IAN CLARK)

Plaintiffs,)

v.)

SHIRE PLC and SHIRE US INC.,)

Defendants.)

No. 09 C 6994

Judge Castillo

**FILED IN CAMERA AND
UNDER SEAL**

THE UNITED STATES' NOTICE OF ELECTION TO INTERVENE

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(2) and (4), the United States notifies the court that it hereby intervenes in this matter. The states of California, Delaware, Florida, Hawaii, Illinois, Indiana, Massachusetts, Michigan, Montana, Nevada, New Hampshire, New Jersey, New Mexico, Oklahoma, Rhode Island, Tennessee, Wisconsin, as well as the District of Columbia also intervene in this matter.

The United States has reached a proposed settlement with the defendants that remains under negotiation.

Consistent with its usual practice, the United States requests that only the relator's Redacted Complaint filed on January 9, 2014, this Notice; and the attached proposed Order be unsealed.¹ The United States requests that all other papers on file in this action remain under seal because in discussing the content and extent of the United States' investigation, such papers

¹ Counsel for the defendants has informed the United States that the defendants plan to oppose the unsealing and to request that the seal remain in effect while the parties finalize the settlement.

are provided by law to the court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

The United States reserves the right to seek the dismissal of the relators' action or claim on any appropriate grounds, including under 31 U.S.C. §§ 3730(b)(5) and (e)(4).

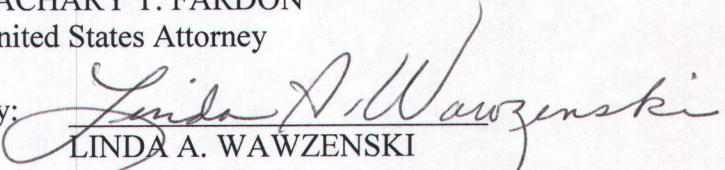
A proposed order accompanies this notice.

Respectfully submitted,

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By:


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Dated: January 9, 2014

CERTIFICATE OF SERVICE

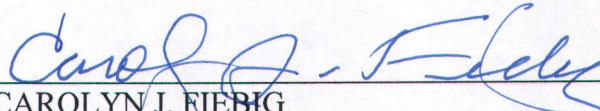
CAROLYN J. FIEBIG hereby declares that she is employed in the Office of the United States Attorney for the Northern District of Illinois and that on the 9th day of January, 2014, she served by placing in a postage-paid envelope addressed to the following individuals and depositing in the United States mail in the United States Courthouse, Chicago, Illinois, a copy of:

THE UNITED STATES' NOTICE OF ELECTION TO INTERVENE

to the following named individuals on the attached service list.

David J. Chizewer
GOLDBERG KOHN BELL BLACK
ROSENBLOOM & MORITZ, LTD.
55 East Monroe Street, Suite 3300
Chicago, Illinois 60603

I declare under penalty of perjury that the foregoing is true and correct. Executed this
9th day of January, 2014.


CAROLYN J. FIEBIG